## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

TRACY ANDRIANO,	) Docket No. 3:15-CV-0863
Plaintiff,	)
	) JUDGE CRENSHAW
v.	) MAGISTRATE JUDGE HOLMES
TYSON FOODS, INC.,	) ) JURY DEMAND
TYSON FRESH MEATS, INC.,	)
a subsidiary of Tyson Foods, Inc.	)
	)
Defendants.	

# DEFENDANTS' FIRST MOTION IN LIMINE TO EXCLUDE INADMISSIBLE TESTIMONY OF CAYMAN CARROLL

Defendants Tyson Foods, Inc. and Tyson Fresh Meats, Inc. (collectively referred to as "Tyson") hereby moves that this Court enter an Order excluding from trial inadmissible testimony by Cayman Carroll regarding (1) what Plaintiff told her about Driton Gashi; (2) how she believes other female employees felt around Driton Gashi; and (3) her belief that Tyson treats men better than women.

In support of its motion, Tyson contemporaneously files a memorandum of law.

#### Respectfully submitted,

### s/Megan M. Sutton

Kenneth A. Weber, BPR No. 015730 Megan M. Sutton, BPR No. 029419 BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, P.C. Baker Donelson Center 211 Commerce Street, Suite 800 Nashville, Tennessee 37201 Telephone: (615) 726-5760 Facsimile: (615) 744-5760

Email: kweber@bakerdonelson.com Email: msutton@bakerdonelson.com

Attorneys for Defendant

#### **CERTIFICATE OF SERVICE**

I hereby certify that on July 17, 2017, a copy of Defendants' First Motion in *Limine* to Exclude Inadmissible Testimony of Cayman Carroll was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

R. Patrick Parker, BPR No. 016847 Parker & Associates 1517 Hunt Club Blvd. Gallatin, Tennessee 37075 Email: pparker@hardaway.net

Attorneys for Plaintiff

s/Megan M. Sutton
Megan M. Sutton